



February 16, 2017

Via ECFS

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Letter – *Mobility Fund*, WT Docket No. 10-208, WC Docket No. 10-90; *Streamlining Deployment of Small Cell Infrastructure*, WT Docket No. 16-421.

Dear Chairman Pai and Commissioners Clyburn and O'Rielly:

CTIA and our member companies share the goals of Chairman Ajit Pai and the Commission of enabling any American who wants high-speed mobile wireless services to get it. The investment and efforts of U.S. wireless providers have enabled American consumers and businesses to reap the benefits of U.S. global leadership in 4G LTE wireless networks and services. Yet there is more that can be done to extend those benefits to all corners of our country. For this reason, CTIA is pleased to see the Commission moving forward to implement Phase II of the Mobility Fund and encourages the Commission to move forward with modernizing its infrastructure siting policies so that high-speed mobile wireless services can be rapidly and efficiently deployed.

Mobility changes lives and unlocks opportunities for all Americans, none more than rural and low-income Americans. A permanent and robust Mobility Fund will help mobile wireless providers serve rural and high-cost areas where consumers currently lack access to critical mobile wireless broadband services.

As Chairman Pai recently highlighted, we should all recognize that “deploying broadband isn’t easy.” The good news is that the U.S. wireless industry invested



\$32 billion in 2015, and \$300 billion over the last 10 years, to deploy 4G LTE wireless networks and services throughout America. As a result, more than 99 percent of the U.S. population has access to 4G LTE connectivity, and nearly 96 percent can choose from three or more 4G LTE wireless service providers. Yet, a report released by the Commission last year found that millions of people in rural areas still lack access to 4G LTE services.

CTIA believes that the Commission's Mobility Fund can help wireless providers meet the challenge of improving and expanding high-speed mobile wireless services to consumers in the highest-cost and most rural areas. To achieve an efficient and effective use of limited Universal Service support, the Commission should ensure that mobile wireless providers seeking to participate in Mobility Fund Phase II have clear and consistent expectations about the reverse auction, deployment, and service obligations that will be necessary to meet the Commission's goals. Providing detailed guidance on these elements in advance of an auction, along with clarity around the compliance process and obligations, will provide much needed certainty to wireless providers that will inform their bidding and business planning.

Recognizing that unserved and underserved areas are among the hardest to reach, CTIA supports a Mobility Fund that is appropriately sized to meet the challenge of deploying mobile wireless services nationwide. Nearly seven years after the Commission first proposed a permanent Mobility Fund, many wireless providers have utilized existing Universal Service support to extend their networks in rural areas. CTIA encourages the Commission to provide a measured and phased transition from legacy Universal Service support that does not inadvertently harm coverage for consumers in these areas, while moving forward expeditiously with a Mobility Fund that can support the availability of high-speed mobile wireless services to rural areas throughout America.

CTIA also encourages the Commission to move forward with modernizing its infrastructure siting policies so that wireless networks can be rapidly and efficiently deployed. The wireless industry continues to improve its 4G LTE networks and, as noted in a recent report from Accenture Strategy, is poised to invest as much as



\$275 billion nationwide over seven years to build out next-generation 5G networks. By encouraging sound infrastructure policies at the federal, state, local, and tribal levels, the Commission can help facilitate deployment of high-speed mobile wireless services throughout the country.

The wireless industry is ready to deliver on the promise of nationwide high-speed wireless services. CTIA believes the Commission can help wireless providers meet this goal through a robust and permanent Mobility Fund and encouraging modernized infrastructure policies at all levels of government.

Sincerely,

Meredith Attwell Baker
President and CEO